

January 14, 2016

BY ECF

The Hon. Richard M. Berman  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courtroom  
500 Pearl St., Courtroom 17B  
New York, NY 10007

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**United States v. Evgeny Buryakov, 15 Cr. 73 (RMB)**

Dear Judge Berman:

We are counsel to Defendant Evgeny Buryakov in this action and write to ask the Court to authorize the following modification to the Protective Order entered in this case [Dkt. No. 21]. Specifically, the Government has consented to permitting Kimberly Haviv, a non-U.S. person who is a lawyer at White & Case in New York, to be provided materials otherwise subject to the Protective Order. Ms. Haviv is a part of the defense team, and providing her access to the case materials is necessary for the purpose of preparing the defense in this case. Ms. Haviv shall be provided with a copy of the Protective Order and shall be advised that she shall not further disseminate or discuss the materials, and must otherwise follow the terms of the Protective Order. Ms. Haviv will execute a copy of the protective order indicating that she agrees to abide by its terms.

Respectfully submitted,



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cc: Emil Bove (by email)